

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMMA GOIDEL, ILANA LEE, MADELEINE LEE,
And LESLEY BROWN, On Behalf Of Themselves
And All Others Similarly Situated,

Plaintiffs,

-against-

AETNA LIFE INSURANCE COMPANY,

Defendant.

Case No. 1:21-cv-07619 (VSB)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of the Settlement, the Declaration of Zoe Salzman dated May 3, 2024 and exhibits thereto, the Declaration of Bryn Bridley and exhibits thereto, and upon all prior pleadings, Plaintiffs, by their counsel Emery Celli Brinckerhoff Abady Ward & Maazel LLP ("ECBAWM") and the National Women's Law Center ("NWLC"), will move this Court at the United States Courthouse, 40 Foley Square, New York, New York, before the Honorable Vernon S. Broderick, United States District Judge, for an Order that:

- (i) Grants preliminary approval of the settlement agreement between the Parties dated April 18, 2024 (the "Settlement Agreement"), Ex. 1 to the Declaration of Zoe Salzman ("Salzman Decl.");¹
- (ii) Preliminarily certifies the Injunctive Settlement Class and the Damages Settlement Class and appoints ECBAWM and the NWLC as class counsel ("Class Counsel");
- (iii) Approves Atticus Administration LLC as the settlement administrator (the

¹ All defined terms have the same meaning as they do in the Settlement Agreement. Salzman Decl., Ex. 1.

(202) 588-5180

*Attorneys for Plaintiffs and the putative
class*